



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

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FOOD SERVICE

**ADMINISTRATIVE POLICY NO. 22
SCHOOL YEAR 2014-2015**

SUBJECT: Independent Review of School Meal Applications

DATE: June 30, 2015

The final rule for *The Independent Review of Applications Required by the Healthy, Hunger-Free Kids Act of 2010* was published in the Federal Register on February 6, 2014. Section 304 of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 requires Local Education Agencies (LEAs) that demonstrate high levels of, or a high risk for, administrative error associated with certification, verification and other administrative processes to conduct an independent review of the initial eligibility determinations for free and reduced price school meal applications for accuracy prior to notifying households of eligibility. The final rule establishes the requirements related to this second review of applications process, which became effective in School Year 2014-2015.

Schools determined to have a high error rate greater than 10% on income-based applications and benefit issuance lists during the Administrative Review Process are required to conduct a second review of all applications. The schools required to conduct an independent review of applications for school year 2015-2016 are attached to this memo.

The independent review of applications is part of an effort to decrease certification errors during the eligibility determination process. The independent review requires certain LEAs to conduct a second, independent review of the applications for free and reduced price meal benefits before eligibility determinations are made (Section 304 of the HHFKA).

The second review must be conducted by an independent individual or entity that did not make the original eligibility determination. This individual or entity is not required to be an employee of the LEA but must be trained to make application determinations. The second review of applications must be completed before the household is notified of eligibility and must not result in the delay of an eligibility determination. Households must be notified of the child's eligibility determination within 10 operating days of receiving the application.

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The second independent review requires a re-evaluation of the eligibility determination made by the original determining official, based on the information provided by the household on the application. The second review must determine if the application is complete. This includes:

- The signature of an adult household member
- The last four digits of a social security number (or indication of "none")
- Names of all household members including the student
- Income information
 - ✓ Income amount for each household member (household members without income including children is indicated as zero)
 - ✓ Income source
 - ✓ Income frequency
 - ✓ Categorical eligibility if applicable

The independent review must also confirm the applications were correctly approved based on current income eligibility guidelines or categorical eligibility determination, as applicable, and that the master list or roster of student names correctly records the student eligibility.

Electronic systems used for eligibility determination are not exempt from the independent second review of applications. In situations where certification errors are caused by incorrect data entry in the electronic data system, data entry for all applications should be reviewed to ensure the information was correctly entered into the electronic system.

The results of the Independent review are reported on the Michigan Department of Education School Nutrition Programs Local Educational Agency (LEA) Second Review of Applications form that is included at the end of this memorandum. The completed form must be returned to the Michigan Department of Education School Nutrition Programs by fax (517) 241-3885 Attention: Lisa Brown Taylor or scanned and emailed to lisabrowntaylor@michigan.gov. The due date is November 17, 2016.

Additional information about the independent second review requirement is available at:

- Q&As Related to the Independent Review of Applications:
[The USDA FNS Q and As Related to the Independent Review of Applications](#)
- The link to the entire final rule in the Federal Register is:
[The USDA FNS 7 CFR Parts 210 and 245 RIN 0584-AE17 Independent Review of Applications.](#)